

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

Uniloc USA, Inc. et al.

§

v.

§

§

§

§

e-MDS, Inc. et al.

**CIVIL ACTION NO. 6:14-cv-625
Consolidated**

**JOINT MOTION FOR ENTRY
OF AGREED PROTECTIVE ORDER**

In accordance with the agreed docket control order (Dkt. No. 264), Plaintiffs and Defendants hereby move for entry of an agreed protective order, which is attached hereto as Appendix A.

Date: May 28, 2015

/s/ Ryan S. Loveless

James L. Etheridge
Texas State Bar No. 24059147
Ryan S. Loveless
Texas State Bar No. 24036997
Brett A. Mangrum
Texas State Bar No. 24065671
ETHERIDGE LAW GROUP, PLLC
2600 E. Southlake Blvd., Suite 120 / 324
Southlake, Texas 76092
Telephone: (817) 470-7249
Facsimile: (817) 887-5950
Jim@EtheridgeLaw.com
Ryan@EtheridgeLaw.com
Brett@EtheridgeLaw.com

**Attorneys for Plaintiffs Uniloc USA, Inc. and
Uniloc Luxembourg SA**

/s/Angela Holt

Frank M. Caprio (pro hac vice)
Angela Holt (pro hac vice)
David W. Holt (pro hac vice)
Bradley Arant Boult Cummings LLP
200 Clinton Ave. West, Suite 900
Huntsville, AL 35801-4900
Telephone: (256) 517-5170
Fax: (256) 517-5200
Email: fcaprio@babco.com
aholt@babco.com
dholt@babco.com

Attorneys for Defendant MEDHOST, Inc.

/s/ Anthony G. Beasley

Steven R. Daniels
Texas Bar No. 24025318
sdaniels@farneydaniels.com
Anthony G. Beasley
Texas Bar No. 24093882
tbeasley@farneydaniels.com
FARNEY DANIELS PC
800 S. Austin Avenue, Suite 200
Georgetown, Texas 78626
Telephone: (512) 582-2828
Facsimile: (512) 582-2829

Attorneys for Defendant e-MDS, Inc. (a Texas Corporation)

By: /s/Fiona A. Bell

Robert H. Reckers (LEAD COUNSEL)
Texas Bar No.: 24039520
rreckers@shb.com
Fiona A. Bell
Texas Bar No.: 24052288
fbell@shb.com
SHOOK, HARDY & BACON LLP
JPMorgan Chase Tower
600 Travis Street, Suite 3400
Houston, Texas 77002-2926
Telephone: (713) 227-8008
Facsimile: (713) 227-9508

ATTORNEYS FOR DEFENDANT
CERNER CORPORATION

/s/Martha Jahn Snyder
QUARLES & BRADY LLP
33 East Main Street, Suite 900
Madison, Wisconsin 53703-3095
Tel: (608)251-5000
Fax:(608)251-9166
Anthony A. Tomaselli
aat@quarles.com
Martha Jahn Snyder
martha.snyder@quarles.com

Brian Craft (Bar No. 04972020)
Eric H. Findlay (Bar No. 00789886)
102 North College Avenue Suite 900
Tyler, Texas 75702
Tel. (903) 534-1100
Fax (903) 534-1137
E-mail: efmdlav@fmdlavcraft.com
E-mail: bcraft@findlaycraft.com

***Attorneys for Epic Systems Corporation and
Epic Hosting LLC***

/s/ Blake T. Dietrich
John M. Jackson
TX Bar No. 24002340
jjackson@jw.com
Matthew C. Acosta
TX Bar No. 24062577
macosta@jw.com
Blake T. Dietrich
TX Bar No. 24087420
bdietrich@jw.com
JACKSON WALKER L.L.P.
901 Main Street
Suite 6000
Dallas, Texas 75202

***ATTORNEYS FOR DEFENDANT
ALTARIS CAPITAL PARTNERS, LLC,
HEALTHTRONICS INFORMATION TECHNOLOGY
SOLUTIONS, INC., AMERISOURCEBERGEN
CORPORATION, AMERISOURCEBERGEN***

HOLDING CORPORATION, INTUITIVE MEDICAL SOFTWARE, LLC, ALTARIS HEALTH PARTNERS II, L.P., ALTARIS HEALTH PARTNERS III, L.P., AHP-HT II ACQUISITION COMPANY, LLC, AHP-HT III ACQUISITION COMPANY, LLC, INTERNATIONAL ONCOLOGY NETWORK SOLUTIONS, INC., AND AMERISOURCEBERGEN SPECIALTY GROUP, INC.

By: /s/ Kevin Rodkey
Brian Craft
State Bar No. 04792020
Eric H. Findlay
State Bar No. 00789886
Findlay Craft, P.C.
102 North College Avenue
Suite 900
Tyler, Texas 75702
Tel. (903) 534-1100
Fax(903)534-1137
E-mail: efindlay@findlaycraft.com
E-mail: bcraft@findlaycraft.com

J. Michael Jakes
John M. Williamson
D. Brian Kacedon
Kevin D. Rodkey
Finnegan, Henderson, Farabow,
Garrett & Dunner LLP
901 New York Avenue, NW
Washington, DC 20001-4413
Phone: (202) 408-4000
Fax: (202) 408-4400
mike.jakes@finnegan.com
john.williamson@finnegan.com
brian.kacedon@finnegan.com
kevin.rodkey@finnegan.com

**ATTORNEYS FOR GREENWAY
MEDICAL TECHNOLOGIES,
INC. AND GREENWAY
HEALTH, LLC**

/s/ Daniel Foster

McDERMOTT WILL & EMERY LLP

Daniel Foster (CA Bar No.
179753) dfoster@mwe.com

James Hill (CA Bar No. 200920)
jhill@mwe.com

Gregory Yoder (CA Bar No.
274702) gyoder@mwe.com

4 Park Plaza, Suite 1700 Irvine, CA 92614
Ph: 949-851-0633

*Attorneys for Defendant Computer Programs and
Systems, Inc.*

/s/ William E. Davis, III

William E. Davis, III
Texas State Bar No. 24047416

THE DAVIS FIRM, PC
213 N. Fredonia Street, Suite 230
Longview, Texas 75601
Telephone: (903) 230-9090
Facsimile: (903) 230-9661
E-mail: bdavis@bdavisfirm.com

Kerry B. McTigue
Barry P. Golob
Blake Coblentz
Aaron S. Lukas
Donald P. McPhail
COZEN O'CONNOR
The Army and Navy Club Building
1627 I Street, NW
Suite 1100
Washington, DC 20006
Phone: (202) 912-4800
Facsimile: (202) 478-0891
kmctigue@cozen.com
bgolob@cozen.com
wcoblentz@cozen.com
alukas@cozen.com
dmcphail@cozen.com

Chad O. Stouffer (pro hac vice)
COZEN O'CONNOR
1900 Market Street
Philadelphia, PA 19107

E-mail: cstouffer@cozen.com

***Attorneys for Endo Health Solutions, Inc.;
Healtronics, Inc.; and Meridian EMR, Inc.***

John M. Jackson
TX Bar No. 24002340
jjackson@jw.com
Matthew C. Acosta
TX Bar No. 24062577
macosta@jw.com
Blake T. Dietrich
TX Bar No. 24087420
bdietrich@jw.com
JACKSON WALKER L.L.P.
901 Main Street
Suite 6000
Dallas, Texas 75202

Don V. Kelly, Fed. Bar. No. 16769
EVANS & DIXON, LLC
Metropolitan Square
211 North Broadway, Suite 2500
St. Louis, Missouri 63102
Telephone: 314-621-7755
Facsimile: 314-621-3136
dkelly@evans-dixon.com

***Attorneys for HealthTronics, Inc. and Meridian
EMR, Inc.***

By: /s/ A. Taylor Corbitt

Elizabeth L. DeRieux
Texas Bar No. 05770585
CAPSHAW DERIEUX LLP
114 E. Commerce Avenue
Gladewater, TX 75647
Telephone: (903) 236-9800
Facsimile: (903) 236-8787
ederieux@capshawlaw.com

Brian D. Siff
New York Bar No. 2435394
SCHIFF HARDIN LLP
666 Fifth Avenue, 17th Floor

New York, NY 10103
Phone: 212-753-5000
Fax: 212-753-5044
bsiff@schiffhardin.com

Ashley Taylor Corbitt
Illinois Bar No. 6299553
SCHIFF HARDIN LLP
233 South Wacker Drive, Suite 6600
Chicago, IL 60606
Phone: (312) 258-5500
Fax:(312) 258-5600
tcorbitt@schiffhardin.com

**ATTORNEYS FOR ALLSCRIPTS
HEALTHCARE SOLUTIONS, INC.**

By: /s/ Jeffrey A. Andrews
Robert J. McAughan, Jr.
Tex. Bar No. 00786096
bmcaughan@smd-iplaw.com
Jeffrey A. Andrews
Tex. Bar No. 24050227
jandrews@smd-iplaw.com
SUTTON MCAUGHAN DEEVER PLLC
Three Riverway, Suite 900
Houston, Texas 77056
(713) 800-5700 (Telephone)
(713) 800-5699 (Facsimile)

**Attorneys for GE Healthcare, Inc.
and General Electric Company
d/b/a GE Healthcare**

CERTIFICATE OF SERVICE

I certify that on May 28, 2015, the foregoing document was served upon all counsel of record via the Court's CM/ECF electronic filing system in accordance with the Federal Rules of Civil Procedure.

/s/Ryan S. Loveless

Ryan S. Loveless